

MELANIE A. HILL
Nevada Bar No. 8796
MELANIE HILL LAW PLLC
1925 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
Tel: (702) 362-8500
Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
Attorneys for Plaintiffs Jeremy John Halgat

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JEREMY JOHN HALGAT, an individual,

Plaintiffs,

vs.

UNITED STATES OF AMERICA, DAVID N.
KARPEL, individually, LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,
DAVID ARBOREEN, individually,
AGOSTINO BRANCATO, individually,
MATTHEW WEAR, individually, DOES 1
through 100; and ROES 1 through 100;
inclusive,

Defendants.

CASE NO.: 2:22-cv-00592-RFB-EJY

**STIPULATION TO EXTEND DEADLINE
TO RESPOND TO THE GOVERNMENT
DEFENDANTS' MOTIONS TO DISMISS
[ECF NOS. 34, 35, AND 36]**

(SECOND REQUEST)

NOW COMES the Plaintiff, JEREMY HALGAT ("Plaintiff"), by and through his attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendants, UNITED STATES OF AMERICA, DAVID N. KARPEL, DAVID ARBOREEN, AGOSTINO BRANCATO, and MATTHEW WEAR, by and through their attorney Glenn Greene who hereby stipulate that the deadline for Plaintiff to respond to the Government Defendants' Motions to Dismiss [ECF Nos. 34, 35, and 36] be extended pursuant to Local Rule IA 6-1.

1 This is the second request for an extension of the deadlines. In support of this Stipulation and
2 Request, the parties state as follows:

3 1. The Government Defendants filed their Motions to Dismiss on October 7, 2022
4 [ECF Nos. 34, 35, and 36].

5 2. Plaintiff's deadline to respond to the Motions to Dismiss is November 14, 2022.

6 3. Counsel for Halgat and the United States have conferred to attempt to resolve
7 counsel for Plaintiffs' request to be added to the Protective Order in place in the underlying criminal
8 case so that Plaintiff may share the criminal discovery with undersigned counsel. The discovery is
9 necessary to further plead the complaint in this case in response to arguments made in the currently
10 pending motions.

11 4. Counsel for Plaintiff has also conferred with the local U.S. Attorneys' office
12 regarding the same. Counsel have determined that a motion will be necessary to allow counsel for
13 Plaintiff to be added to the Protective Order in the underlying criminal case so that discovery may be
14 reviewed by counsel for Plaintiff and used to further plead the complaint in this case. It is also
15 undersigned counsel's understanding that the United States has no objection to Plaintiff's counsel
16 being added to the protective order upon further motion and order of this court.

17 5. To allow this motion to be filed and allow counsel to review the underlying criminal
18 discovery for purposes of prosecuting this civil case and further respond to the pending Motions to
19 Dismiss, the parties have stipulated to extend Plaintiff's response deadline to December 6, 2022. The
20 parties have further stipulated to allow the Government Defendants until January 13, 2023 to file their
21 responses to Plaintiff's filing.

22 6. This Request for an extension of time is not sought for any improper purpose or
23 other purpose of delay. Rather, it is sought by the parties solely to allow sufficient time to allow
24 Plaintiff's counsel to be added to the Protective Order in the underlying criminal case, review the
25 criminal discovery, and respond to the Government Defendants' Motions to Dismiss.

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WHEREFORE, the parties respectfully request that the Court extend the deadlines as stipulated to herein.

DATED this 14th day of November, 2022.

DATED this 14th day of November, 2022.

BRIAN M. BOYNTON
Acting Assistant Attorney General
Civil Division

MELANIE HILL LAW PLLC

C. SALVATORE D'ALESSIO, JR.
Director
Torts Branch, Civil Division

/s/ Melanie A. Hill
MELANIE A. HILL
1925 Village Center Circle, Suite 150
Las Vegas, NV 89134
Telephone: (702) 362-8500
Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
Attorneys for Plaintiff Jeremy John Halgat

ANDREA W. MCCARTHY
Acting Assistant Director
Torts Branch, Civil Division

/s/Glenn S. Greene
GLENN S. GREENE
Senior Trial Attorney
Torts Branch, Civil Division
Constitutional and Specialized Tort Litigation
P.O. Box 7146, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-4143
Fax: (202) 616-4314
Glenn.Greene@usdoj.gov
*Attorneys for Defendants the United States of
America, David Karpel, David Arboreen,
Agostino Brancato, and Matthew Wear*

ORDER

IT IS SO ORDERED.

11/2/22
DATE


RICHARD E. BOULWARE, II
United States District Court